



United States Environmental Protection Agency  
Washington, D. C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <u>N</u> 2 <u>5</u> 3 <u>A</u> <u>S</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <u>1</u> <u>9</u> 11 12 <u>9</u> <u>0</u> <u>1</u> <u>1</u> <u>1</u> <u>3</u> 17 18 <u>C</u> 19 <u>R</u> 20 <u>2</u>					
Remarks					
21 _____ 66					
Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 <u> </u> <u> </u> 69 70 <u>3</u>		71 <u>N</u>	72 <u>N</u>	73 <u> </u> <u> </u> 74 75 <u> </u> <u> </u> <u> </u> <u> </u> 80	

## Section B: Facility Data

Name and Location of Facility Inspected	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	Permit Effective Date
StarKist Samoa, Inc.	11:00	3-8-87
Pago Pago, Tutuila	Exit Time/Date	Permit Expiration Date
American Samoa	12:20 pm/11-13-90	3-7-92
Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Robert Higgins	WWTs Supervisor	
Name, Address of Responsible Official	Title	
Maurice Callaghan	General Manager	
StarKist Samoa, Inc.	Phone No.	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P.O. Box 368, Pago Pago, A.S.		

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment	<u>S</u> Operations & Maintenance
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S</u> Compliance Schedules	<u>N</u> Sludge Disposal
<u>S</u> Facility Site Review	<u>S</u> Effluent/Receiving Waters	<u>M</u> Self-Monitoring Program	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See Attached Inspection Report

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
<u>Michael J. Lee</u> Michael J. Lee	EPA Region 9 415-744-1592	9-17-91
Signature of Reviewer	Agency/Office	Date
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

NPDES INSPECTION REPORT  
STARKIST SAMOA, INC.

On November 13, 1990 the EPA conducted an inspection of the StarKist Samoa, Inc. (StarKist) tuna cannery, Tuluila Island, American Samoa.

The cannery receives whole tuna which is processed into canned tuna and dried fish meal. Waste streams from the cannery consist mainly of fish wastes, fresh water, press water, pre-cooker juice and sea water. The fish wastes, fresh water, press water, pre-cooker juice are treated by the cannery's waste treatment plant. The sea water is used as a once through thaw water and does not pass through the DAF treatment unit. The treatment plant consist mainly of a dissolved air flotation unit that utilizes polymers and coagulant (alum) to enhance solids recovery. Effluent from the DAF treatment facility is discharged to Pago Pago Harbor via a pipe line which extends directly out from the cannery. Sludge from the DAF treatment facility and high strength wastes (press water and pre-cooker juice) are barged to a designated ocean disposal site which is regulated separately under an ocean dumping permit, No. OD 90-02. The ocean disposal site is approximately 5.5 miles southwest of Pago Pago Harbor. Both canneries (StarKist and Samoa Packing) utilize the same ocean dumping site and vessel to dispose sludge.

The cannery has a daily tuna processing capacity of about 500 tons/day. The cannery averaged approximately 396 tons/day for the month of November, 1990. The effluent flowmeter indicated a flow of about 2.7 MGD at the time of the inspection. The cannery averaged approximately 1.68 MGD for the month of November, 1990. The effluent temperature meter indicated a temperature of 85 F and a pH of 7.5 at the time of the inspection.

StarKist's NPDES permit was issued in March, 1987. Both canneries (Samoa Packing and StarKist) sought an evidentiary hearing on certain of the provisions of the permit, including the requirement regarding compliance with the interim effluent limitations for nitrogen and phosphorus of the permit. In September, 1989 the canneries appeal was denied by EPA and ruled that the interim effluent limits set forth in the permit for nitrogen and phosphorus were effective immediately and put the canneries in non-compliance with their permits. Although the canneries sought an appeal it was denied in November, 1989. Although Samoa Packing decided to file a petition for review by the Ninth Cir

cuit Court of Appeals in February, 1990, it did not appear that a favorable decision would be forth coming. As a result settlements were negotiated with EPA and the American Samoa government.

On June 18, 1990, EPA issued an administrative order, Docket No. IX-FY91-22, to StarKist for violations of its NPDES permit interim effluent limitations for nitrogen and phosphorus. The order required StarKist to install all necessary equipment and implement high strength waste segregation by July 31, 1990. The order also established new interim effluent limitations for nitrogen and phosphorus, required a three month intensive monitoring program, commencement of an engineering feasibility study for alternatives to comply with NPDES permit final effluent limitations, select an alternative, and comply with NPDES permit final effluent limitations.

The American Samoa Government also issued an consent decree to StarKist in August, 1990. The requirements of the American Samoa consent decree and EPA administrative order are the same with the exception that the American Samoa consent decree required a penalty payment for past violations of water quality standards and includes stipulated penalties in the event of violations of the interim effluent limitations and the compliance schedule.

During the site inspection the wastewater treatment facility appeared to be operating satisfactory. The dissolve air flotation (DAF) treatment unit appeared in satisfactory condition. However, a close inspection of the DAF unit was not performed due to the facility's practice of spraying a masking agent over the DAF unit for odor control. StarKist indicated that they performed an operation and maintenance inspection on the DAF unit in June/July, 1990 and corrected any problems which were discovered.

High strength waste segregation was being implemented as required by the order. StarKist is utilizing a 250,000 gallon storage tank for its high strength wastes (press water and pre-cooker juice). The high strength waste streams are metered to determine volumes. The DAF sludge is stored in a separate storage tank. The high strength waste segregation is performed by the storage and ultimate disposal, by barging, of the high strength wastes along with the DAF sludge to the ocean dumping site.

StarKist indicated during the inspection that they had completed the intensive monitoring of the high strength wastes for October and submitted data to EPA. StarKist was required to perform a three month (August-October) intensive monitoring program

of the high strength wastes. Based upon the review of the intensive monitoring data EPA would consider adjustment of the effluent limitations for nitrogen and phosphorus. During the three month intensive monitoring period there were two violations of the interim effluent limitations. A monthly average violation in August for phosphorus and daily maximum violation in October for nitrogen were reported.

Although there were two violations of the interim effluent limitations during the three month intensive monitoring program it was determined that adjustments to the interim effluent limitations for nitrogen and phosphorus were not necessary and limitations would remain the same as presented in the AO. However, StarKist has reported monthly average violations of interim effluent limitations for nitrogen in March, April and May, 1991. There have also been two each daily maximum violations for nitrogen in March and April, 1991.

As part of the AO requirements StarKist is to complete an engineering feasibility study to assess the viable alternatives to achieve compliance with its NPDES permit final effluent limits. At the time of the inspection StarKist indicated that they had contracted with CH2M Hill for the feasibility study and expected to complete and submit the study as required in March, 1991. EPA received the engineering study in March, 1991. Based on discussions and review of the StarKist and Samoa Packing feasibility studies it appears that a joint outfall for the canneries will be the recommended alternative.

During the inspection the stormwater monitoring was discussed. StarKist has two discharge points, 001 and 002. The stormwater discharge is designated as 002 and has not been monitored in accordance with its NPDES permit requirements. StarKist indicated that the stormwater pipe discharged under the wharf and may be difficult to monitor. However, StarKist indicated that they would assess the situation and develop a monitoring point to comply with the NPDES permit. StarKist has started monitoring and reporting stormwater data (temperature, turbidity, and O&G) as of March, 1991.

Stormwater at the facility is collected by a system of ground catchments and routed to the stormwater discharge pipe which discharges under the wharf. There are a number of stormwater catchments and it is difficult to verify exactly where each one leads due to the layout and age of the facility.

Inspection of the effluent flow appeared normal for the tuna cannery. Flow, temperature, and pH are continuously monitored at the effluent station just prior to discharge. Flow, temperature, and pH instrumentation is calibrated in-house on a two week schedule according to StarKist representatives.

StarKist indicated that efforts were in progress to install a cooling water tower to control effluent temperatures. Effluent limits for temperature will change from 90F to 85F in March, 1991. StarKist indicated that they anticipate installation of the cooling water tower by early March, 1991 to comply with the new temperature limits of its permit.